

IN THE UNITED STATES DISTRICT COURT
IN THE MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION
CIVIL ACTION NO. 1:24-CV-975-JPB-JLW

JAMES CAMPBELL,

Plaintiff,

v.

CABARRUS COUNTY BOARD OF
COMMISSIONS; AND STEVE
MORRIS, IN HIS OFFICIAL
CAPACITY AS BOARD
CHAIRMAN,

Defendants

JOINT RULE 26(f) REPORT

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.1(b), a meeting was held on April 30, 2025, via telephone, and was attended by Emily Rae and Troy D. Shelton, attorneys for Plaintiff; and James D. McAlister, attorney for Defendants.

2. The parties propose to the Court the following discovery plan:

a. Discovery should not be postponed or limited pending determination of any pending dispositive motions. The agreed-upon “commencement date” of discovery will be: May 12, 2025.

a. Discovery will be needed on the following subjects:

i. The circumstances surrounding the claims asserted by Plaintiff;

- ii. Plaintiff's claims and Defendants' defenses;
- iii. Plaintiff's alleged damages; and
- iv. Other relevant matters as may be determined through discovery.

b. Discovery shall be placed on a case-management track established in L.R. 26.1.

c. The parties agree that the appropriate plan for this case is that designated in L.R. 26.1 as: Standard.

d. The date for the completion of all discovery (general and expert) is: September 30, 2025.

e. Disclosures under Rule 26(a)(1) are due on or before May 21, 2025.

f. Reports from retained experts under Rule 26(a)(2) are due during the discovery period:

- i. From Plaintiff by July 12, 2025.
- ii. From Defendants by August 12, 2025.

g. Each party may propound up to 15 Requests for Admissions and up to 15 Interrogatories upon each other party.

h. Each party is allowed to depose every other party and then have up to four (4) non-party depositions.

3. Mediation should be conducted late in the discovery period, the exact date to be set by the mediator after consultation with the parties. The parties will agree on a mediator, or will seek a determination from the Court if a mediator cannot be agreed upon.

4. All motions, including preliminary and dispositive motions, shall be filed on or before November 1, 2026.

5. Preliminarily, the parties agree to the following schedule for depositions: All depositions to be completed by the close of the discovery period on September 30, 2025.

6. Other issues:

a. The parties have discussed special procedures for managing this case, including the reference of this case to a magistrate judge on consent of the parties under 28 U.S.C. § 636(c), or appointment of a master. The parties do not consent to the referral of the case to a magistrate judge.

c. Trial of the action is expected to take approximately five (5) days. A jury trial has been demanded.

d. The parties have discussed whether the case will involve the possibility of confidential or sealed documents. The case may involve confidential or sealed documents and the parties have separately filed a L.R. 5.5 Report.

This the 16th day of May, 2025.

Respectfully submitted,

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